

Alistair E. Newbern UNITED
FOR THE MILITARY

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UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Judge William L. Campbell, Jr.
Magistrate Judge Alistair E. Newbern

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without adversely affecting the parties' ability to prepare for trial. The proposed modifications below also comply with Local Rule 16.01(h)(1) ("Absent court order, no dispositive motion deadline, including response and reply briefs, shall be later than ninety (90) days in advance of the target trial date.").

5. Accordingly, Colonial respectfully requests that certain deadlines in the Case Management Order be changed per the chart below:

| Item | Current Deadline | Proposed Deadline |
|----------------------------------------------------------------------------|------------------------------------|-------------------|
| Serve written discovery | None | No change |
| Amend or add parties | 3/12/21 | 3/31/21 |
| Subsequent case management conference | 3/23/21 | No change |
| Complete all written discovery and depose all fact witnesses | 6/1/21 | 7/30/21 |
| File discovery motions | 6/15/21 | 8/13/21 |
| Plaintiff to identify and disclose all expert witnesses and expert reports | 6/4/21 | 8/4/21 |
| Defendant to identify and disclose all expert witnesses and expert reports | 28 days after Plaintiff disclosure | No change |
| File dispositive motions | 7/30 | 9/30/21 |
| Complete expert depositions | 28 days after Defendant disclosure | No change |

6. This request does not affect the current trial date of February 22, 2022, set in the Court's Order dated February 5, 2021 (Docket No. 27).

7. After conferring with counsel for Plaintiff regarding this motion, the parties were not able to reach a consensus on the requested modifications, but the parties wish to discuss this motion and a discovery plan with the Court at the scheduled March 23, 2021 Case Management Conference.

Respectfully submitted,

s/ Brian M. Dobbs

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CERTIFICATE OF SERVICE

I certify that I filed this document electronically using the Court's electronic case management system, which will send notice to:

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